

KJ:EW  
F. #2003R02222

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**FILED**  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT, E.D.N.Y.  
★ AUG 22 2005 ★  
BROOKLYN OFFICE

- - - - - X

UNITED STATES OF AMERICA

- against -

RYHENE GRISSON and  
DANIELLE ROBINSON,

Defendants.

- - - - - X

THE GRAND JURY CHARGES:

INTRODUCTION

At all times relevant to this Indictment, unless otherwise indicated:

National Funding Services

1. National Funding Services ("NFS"), located at 2678 Linden Boulevard, Apartment 8E, Brooklyn, New York, purported to be a not-for-profit organization. From in or about and between September 2000 and December 2002, NFS received mail at Post Office Box 653, Brooklyn, New York, 11240. From in or about and between December 2002 and September 2003, NFS received mail at Post Office Box 23812, Brooklyn, New York, 11202. NFS purported to be in the business of helping small businesses and individuals obtain financing.

S U P E R S E D I N G  
I N D I C T M E N T

Cr. No. 03-1173 (S-1) (ERK)  
(T. 18, U.S.C., §§ 1341,  
1349, 2 and 3551 et seq.)

2. NFS solicited customers through the United States mails by claiming to offer guaranteed interest-free loans for its members. As a condition of becoming a member of NFS, individuals were required to pay a \$200 membership initiation fee and monthly membership dues in the amount of \$50.

The Defendants

3. The defendant RYHENE GRISSON was the President of NFS. The defendant DANIELLE ROBINSON was the Chief Executive Officer of NFS. NFS had no other employees.

The Scheme to Defraud

4. From in or about and between September 2000 and September 2003, the defendants RYHENE GRISSON and DANIELLE ROBINSON devised and participated in a scheme to defraud individuals (the "Victims") by inducing them to send money to NFS for the purported purpose of obtaining guaranteed interest-free loans. In fact, as the defendants well knew, NFS could not and would not guarantee or extend any loans.

5. In order to obtain money from the Victims, the defendants RYHENE GRISSON and DANIELLE ROBINSON sent NFS solicitations and information packets, which falsely stated that NFS offered guaranteed interest-free loans for members, through the United States mails. The defendants also induced the Victims to send NFS initiation payments and membership dues by United States mail to Post Office boxes in Brooklyn, New York, and deposited the Victims' payments and dues in NFS's bank account at Washington

Mutual Bank.

6. The Victims, after sending their initiation payments and membership dues, requested the advertised loans from NFS. NFS did not provide any of the requested loans to any of the Victims.

COUNT ONE  
(Mail Fraud Conspiracy)

7. The allegations contained in paragraphs 1 through 6 are realleged and incorporated as though set forth fully in this paragraph.

8. In or about and between September 2000 and September 2003, both dates being approximate and inclusive, within the Eastern District of New York, the defendants RYHENE GRISSON and DANIELLE ROBINSON did knowingly and intentionally conspire to devise a scheme and artifice to defraud the Victims and to obtain money and property from the Victims by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing and attempting to execute such scheme and artifice, to cause mail matter, to wit: NFS solicitations, information packets, initiation payments and membership dues, to be delivered by the United States Postal Service, in violation of Title 18, United States Code, Section 1341.

(Title 18, United States Code, Sections 1349 and 3551 et seq.)

COUNTS TWO THROUGH SIX  
(Mail Fraud)

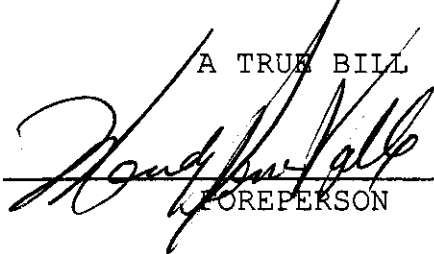
9. The allegations contained in paragraphs 1 through 6 are realleged and incorporated as if set forth fully in this paragraph.


10. On or about the dates set forth below, within the Eastern District of New York and elsewhere, the defendants RYHENE GRISSON and DANIELLE ROBINSON did knowingly and intentionally devise a scheme and artifice to defraud John Does #1 through #4 and Jane Doe #1, individuals known to the Grand Jury, and to obtain property from these individuals by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice and attempting to do

so, caused mail matter, to wit, NFS Information Packets, to be delivered by the United States Postal Service from Brooklyn, New York to the following locations:

Count	Date Mailed	Recipient
TWO	June 18, 2001	John Doe #1 New Castle, Indiana
THREE	September 21, 2001	John Doe #2 Columbus, Ohio
FOUR	January 18, 2002	John Doe #3 Montauk, New York
FIVE	February 5, 2002	John Doe #4 Mansfield, Ohio
SIX	June 30, 2002	Jane Doe #1 Bronx, New York

(Title 18, United States Code, Sections 1341, 2 and 3551  
et seq.)

A TRUE BILL  
  
FOREPERSON

  
ROSLYNN R. MAUSKOPF  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

FORM DBD-34  
JUN. 85

No. \_\_\_\_\_ Action: \_\_\_\_\_

**UNITED STATES DISTRICT COURT**

*EASTERN District of NEW YORK*

*CRIMINAL Division*

**THE UNITED STATES OF AMERICA**

vs.

**RYHENE GRISSON and DANIELLE ROBINSON,  
Defendants.**

**INDICTMENT**

(T. 18, U.S.C., §§ 1341, 1349,  
2 and 3551 (2<sup>nd</sup> seq.))

*A true bill*

*Foreman*

*Filed in open court this \_\_\_\_\_ day,*

*of \_\_\_\_\_ A.D. 20 \_\_\_\_\_*

*Clerk*

*Bail, \$ \_\_\_\_\_*

*Evan C. Williams, Assistant U.S. Attorney (718-254-6430)*

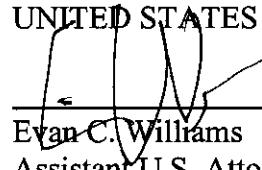
**INFORMATION SHEET**

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

1. Title of Case: **United States v. Ryhene Grisson & Danielle Robinson**
2. Related Magistrate Docket Number(s): **03-M-1455**  
None ( )
3. Arrest Date: **9/24/03**
4. Nature of offense(s): ☒ Felony  
☐ Misdemeanor
5. Related Cases - Title and Docket No(s). (Pursuant to Rule 50.3 of the  
Local E.D.N.Y. Division of Business Rules): \_\_\_\_\_  
\_\_\_\_\_
6. Projected Length of Trial: Less than 6 weeks (X)  
More than 6 weeks ( )
7. County in which crime was allegedly committed: Queens  
(Pursuant to Rule 50.1(d) of the Local E.D.N.Y. Division of Business Rules)
8. Has this indictment/information been ordered sealed? ( ) Yes (X) No
9. Have arrest warrants been ordered? (X) Yes (X) No
10. Is a capital count included in the indictment? ( ) Yes (X) No

ROSLYNN R. MAUSKOPF  
UNITED STATES ATTORNEY

By:

  
\_\_\_\_\_  
Evan C. Williams  
Assistant U.S. Attorney  
718-254-6430